

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)
vs.)
Plaintiff,) CRIMINAL NO. 22-30107-DWD
vs.)
CHRISTOPHER M. BECHTOLD)
Defendant.) Title 18
) United States Code,
) Section 1347

INDICTMENT

FILED

THE GRAND JURY CHARGES:

SEP 20 2022

COUNT 1

Health Care Fraud – 18 U.S.C. § 1347

**CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE**

1. At all times material to this indictment:

a. The Illinois Department of Human Services (“IDHS”) operated a program known as the Home Services Program (“HSP”). This program provided services to low-income individuals with severe disabilities so they could remain in their homes and remain as independent as possible. The Illinois Home Services Program was a health care benefit program, as defined by Title 18, United States Code, Section 24(b).

b. One of the services provided by the Homes Services Program was known as the Personal Assistant program. Personal Assistants were paid an hourly wage to provide assistance with household tasks and personal care to qualified beneficiaries. Personal Assistants were selected and supervised by the disabled person.

c. The Illinois Home Services Program, including the Personal Assistant program, was jointly funded by the State of Illinois and the United States Department of Health and Human Services.

d. Defendant **CHRISTOPHER M. BECHTOLD** worked as a personal assistant for a qualified beneficiary of the Home Services Program, identified hereafter as D.G.

e. In order to act as D.G.'s personal assistant, **CHRISTOPHER M. BECHTOLD** signed and submitted to IDHS an Individual Provider Payment Policies form, which acknowledged he had reviewed and understood the program's policies, including the following related to fraud:

Individual Providers can only be paid for the hours they worked for the customer per the HSP Service Plan. Billing for hours not worked constitutes Medicaid fraud.

Individual Providers are not allowed to subcontract. Subcontracting means letting someone else work in your place, putting the time on your time sheet and then paying them yourself. This is not only an illegal practice but also causes problems with Social Security withholding. Each Individual Provider will only be paid for services which he or she provided directly to the customer.

Individual Providers cannot charge HSP for the same hours worked when working another job. This includes working for other HSP customers or as a childcare provider paid through the Department of Human Services. This constitutes fraud and will be prosecuted as such.

2. From on or about May 1, 2019 to on or about November 30, 2021, in Madison County, within the Southern District of Illinois,

CHRISTOPHER M. BECHTOLD,

defendant herein, did knowingly and willfully engage in a scheme to defraud a health care benefit program, affecting interstate commerce as defined in Title 18, United States Code, Section 24(b), namely the Illinois Home Services Program, in connection with the delivery of and payment for health care benefits and services.

3. It was the object of this scheme to defraud that **CHRISTOPHER M. BECHTOLD** received payments from the Home Services Program for time that he did not actually work as a personal assistant.

4. As part of the scheme to defraud, since at least May 2019, **CHRISTOPHER M. BECHTOLD** worked at Midwest Members Credit Union in Wood River, Illinois.

5. It was further part of the scheme to defraud that **CHRISTOPHER M. BECHTOLD** falsely claimed hours of personal assistant services that he did not actually

perform on the dates and times reported, because **CHRISTOPHER M. BECHTOLD** was actually working at Midwest Members Credit Union during those dates and times.

6. On or about July 15, 2019, in Madison County, within the Southern District of Illinois,

CHRISTOPHER M. BECHTOLD,

for the purpose of executing the scheme to defraud described in the preceding paragraphs, and attempting to do so, knowingly did cause to be submitted to IDHS a Home Services Program Time Sheet requesting payment for personal assistant services he did not actually perform;

In violation of Title 18, United States Code, Section 1347.

COUNT 2
Health Care Fraud – 18 U.S.C. § 1347

1. Paragraphs 1 through 5 of Count 1 of this indictment are re-alleged here.
2. On or about October 5, 2019, in Madison County, within the Southern District of Illinois,

CHRISTOPHER M. BECHTOLD,

for the purpose of executing the scheme to defraud described in the preceding paragraphs, and attempting to do so, knowingly did cause to be submitted to IDHS a Home Services Program Time Sheet requesting payment for personal assistant services he did not actually perform;

In violation of Title 18, United States Code, Section 1347.

COUNT 3
Health Care Fraud – 18 U.S.C. § 1347

1. Paragraphs 1 through 5 of Count 1 of this indictment are re-alleged here.
2. On or about March 2, 2020, in Madison County, within the Southern District of Illinois,

CHRISTOPHER M. BECHTOLD,

for the purpose of executing the scheme to defraud described in the preceding paragraphs, and

attempting to do so, knowingly did cause to be submitted to IDHS a Home Services Program Time Sheet requesting payment for personal assistant services he did not actually perform; In violation of Title 18, United States Code, Section 1347.

COUNT 4
Health Care Fraud – 18 U.S.C. § 1347

1. Paragraphs 1 through 5 of Count 1 of this indictment are re-alleged here.
2. On or about May 1, 2021, in Madison County, within the Southern District of Illinois,

CHRISTOPHER M. BECHTOLD,

for the purpose of executing the scheme to defraud described in the preceding paragraphs, and attempting to do so, knowingly did cause to be submitted to IDHS a Home Services Program Time Sheet requesting payment for personal assistant services he did not actually perform;

In violation of Title 18, United States Code, Section 1347.

A TRUE BILL.




PETER T. REED
Assistant United States Attorney


JAMES M. CUTCHIN
Attorney for the United States Acting
Under Authority Conferred by 28 U.S.C. § 515

Recommended Bond: \$5,000 bond.